

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

BEVERLY AHNERT, Individually and as Executrix
of the Estate of Daniel Ahnert, Deceased.

Plaintiffs,

v.

EMPLOYERS INSURANCE COMPANY
OF WAUSAU, SPRINKMANN SONS CORPORATION,
WISCONSIN ELECTRIC POWER COMPANY, AND
PABST BREWING COMPANY,

Defendants.

Case No. 10-cv-156-PP

BEVERLY AHNERT, Individually and as Executrix
of the Estate of Daniel Ahnert, Deceased.

Plaintiffs,

v.

EMPLOYERS INSURANCE COMPANY OF WAUSAU,
PABST BREWING COMPANY,
SPRINKMANN SONS CORPORATION, AND
WISCONSIN ELECTRIC POWER COMPANY,

Defendants.

Case No. 13-cv-1456-CNC

Plaintiffs' Daubert Motion regarding "Any Exposure" and "Every Exposure"

Plaintiffs' experts will not offer testimony that "any exposure" or "every exposure" is a cause of mesothelioma providing that Defendants do not offer such testimony in direct or cross examination. By not offering this testimony, Plaintiffs are not limiting the ability of experts to base causation or other testimony on personal knowledge or scientific literature/studies.

Plaintiffs' adopt and incorporate Defendants' anticipated *Daubert* briefing which seeks to exclude the "any exposure" and/or "every exposure" theories of causation. This Court's *Daubert* rulings should be equally applicable to all parties and preclude causation testimony based only on those theories to establish nonparty fault for the verdict form.

RELIEF REQUESTED

For the reasons above, this Court should enter an order prohibiting all parties from offering “any exposure” or “every exposure” testimony.

Dated: September 21, 2017

/s/ Daniel B. Hausman

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Certificate of Service

I hereby certify that on September 21, 2017, I caused the foregoing to be electronically filed with the United States District Court for the Eastern District of Wisconsin using the CM/ECF system which will automatically send all necessary notifications of this filing to CM/ECF participants in this case.

Dated: September 21, 2017

/s/ Daniel B. Hausman

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